

## **DECLARATION OF DEBORAH STRAIT**

I, Deborah Strait, declare:

4       1. This declaration is based upon my personal knowledge and if called upon to testify  
5 as to the matters stated herein, I could and would competently do so.

6       2. I am the daughter of Brent and Katherine Massae. Following my father's death, my  
7 mother was identified as his Representative Claimant (See Exh. 1). Following my mother's death,  
8 I was identified as her representative claimant (See Exh. 2) such that I now stand as the  
9 Representative Claimant for both of my parents, Brent and Katherine Massae. I am also the trustee  
10 of the July 28, 2009 Massae Trust (See Certification of Trust at Exh. 3), which was the title holder  
11 of the property located at 6150 Sawmill Rd in Paradise, California, 95969, which property was  
12 damaged by the November 8, 2018, Camp Fire and is the subject matter of the claims herein.

13           3.       My father Brent suffered from a heart condition that preceded the Fire and worsened  
14 after it. My mother suffered from panic attacks, high blood pressure and post-traumatic stress  
15 following the Fire.

16       4.     Due to their advanced age and infirmed physical and mental condition, I was very  
17 involved in the post-Fire administration.

18        5.        My parents moved back to Paradise in late January of 2019. The area looked like a  
19 war zone. My mother often thought that the town was still on fire.

20        6.        My mom was too traumatized to file a proof of claim in the early months of 2019.  
21        Also, a deadline had not yet been set so we were unaware of any deadline to file. Nor we aware of  
22        any procedural mandate that would require us to file a claim on behalf of my father before he died  
23        in order to preserve his claims arising from the fire.

24        7. After my father's death, my mother's condition worsened and she was ready to  
25 give up on life.

1       8. I was finally able to convince my mother to file a proof of claim prior to the  
2 December 31, 2019 deadline. We submitted it through my email, but the form we used did not  
3 allow for the inclusion of other claimants like my father. This proof of claim, POC – 92859, did  
4 not include a place to list any additional family members such as my father.  
5

6       9. I did not know that my mother had mailed an earlier proof of claim on behalf of  
7 both my parents in the days before the deadline. I did not help my mother with this and so can  
8 only assume that a friend or neighbor helped her.  
9

10      10. We did not hire counsel (LeviN Law Group, PLC) until June of 2020, long after  
11 any deadlines and procedural requirements had passed and so did not have the benefit of counsel.  
12

13      11. My mother passed on May 12, 2021.  
14

15      I declare under penalty of perjury that the foregoing is true to the best of my knowledge.  
16      Executed this 4th day of May 2022 at Shasta County, California.  
17

18      DocuSigned by:  
19        
20      \_\_\_\_\_  
21      DEBORAH STRAIT  
22  
23  
24  
25  
26  
27  
28